

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	MJ Criminal No. 04-273-JLA
)	
)	
MICHAEL CUGNO)	

MOTION FOR DISCHARGE OF MORTGAGE

Now comes the defendant Michael Cugno and respectfully moves this Honorable Court to order that the mortgage on his sister Nancy Davidson's property located at 59 Linden Street, Apartment 312, Taunton, MA 02780 in Bristol County, Massachusetts, be discharged. Said mortgage was given to the United States as a condition of the defendant's release on bail prior to trial.

In support thereof the defendant says that after trial in the United States District Court in El Paso, Texas, he was convicted and sentenced to a period of incarceration. He is presently serving said sentence, and complied with all the conditions of his release including self surrender. His sister now seeks to secure a loan on said property and needs to have the mortgage at issue here discharged.

Respectfully submitted,
By his attorney,

/s/ Robert Sheketoff
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